



ROBERT J SHIVER, LLC

Robert J Shiver LLC
Prudent Revere Capital Group, Inc.
Robert J Shiver

To Whom It May Concern,

I am writing on behalf of the Defendant's in the Johanna L Ayres against Robert J Shiver, Robert J Shiver LLC and Prudent Revere Capital Group, Inc. Civil Action NO. 21 CV 0473.

I am not a lawyer, nor have I had any legal training. However, I wanted to respond to both the Motion by The Curlew Law Firm to Withdraw as Counsel for the Defendants as well as the recent Amended Complaint file by the Plaintiff's in the above case.

In regard to the Motion to Withdraw as Counsel by the Curlew Law Firm, there are several facts that are omitted from this Motion. Specifically, Mr. Brian Lehman (former partner in The Curlew Law Firm and the only experienced lawyer defending the claims alleged in the Plaintiff's case, left the Curlew Law Firm only months into the case. Mr. Isaac Myers admittedly had little or no experience in these alleged allegations as the sole remaining attorney within The Curlew Law Firm. In subsequent discussions with Mr. Isaac Myers, he assured me he would find the legal expertise to complete the process for having these alleged claims dismissed. Mr. Myers did find a Lawyer that, supposedly, had the expertise in these matters. Through this concerning process, our response to the Complaint was filed.

On Friday August 6th, 2021, the Plaintiff's Complaint was ordered to be dismissed " unless she moves to amend in thirty days " ordered by Judge Edward R.Korman.

As explained initially to Mr. Brian Lehman as well as to Mr. Isaac Myers, the Defendants financial situation and ability to pay was highly dependent on receiving it's 2nd grant of CV-related PPP stimulus grants as well as other capital raising processes. Unfortunately, the PPP deadlines ended without approval. In addition, and as explained consistently to Mr. Myers, we are currently in several capital raising processed that we continue to be confident of.

The Defendant's relationship with the Curlew Law Firm and that of Mr. Isaac Myers remains cordial and friendly. The Defendants inability to consistently honor our Retainer agreement is NOT willing, just the reality of the situation the Defendants are currently in. We will honor our outstanding amounts under the Retainer agreement.

Secondly, the Defendants would like the opportunity to respond to the recently filed Amended Complaint and respectfully asked the Court for a reasonable time to either continue representation with the Curlew Law Firm or retain other suitable Legal Counsel. There are material misstatement and factually untrue components in the Plaintiff's Amended Complaint, among other issues, we would like to address.

Thank you for taking the time to read and I will be in attendance of our required conference call tomorrow at 11am, September 9th, 2021.

Sincerely, Robert J Shiver